

1:20MJ2094

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, DEA Task Force Officer Maria Matos, hereby submit this affidavit in support of a criminal complaint against Jeffrey Poultney-Younger (“YOUNGER”) for the following federal crimes that YOUNGER committed on or about April 7, 2020, in the Northern District of Ohio:

- a) Possession of 40 grams or more of a mixture or substance containing a detectable amount of fentanyl with intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B);
- b) Possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A); and
- c) Felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

**AFFIANT TRAINING AND EXPERIENCE**

1. Affiant has been a Police Officer with the City of Cleveland since March 25, 1991, assigned to the Narcotics Unit. Affiant is currently a Task Force Officer (TFO) for the DEA, and has been so employed since March 2019. Affiant has been assigned to the Cleveland Resident Office in Cleveland, Ohio, since March 2019.

2. Affiant received specialized training at the Cleveland Police Academy and is OPOTA certified. Affiant is trained regarding the identification of narcotic controlled substances and the operation of drug trafficking organizations. Affiant has also been involved in the investigation of numerous individuals and organizations involved in the manufacturing, distribution, and use of controlled substances. During Affiant’s employment with DEA as a Task Force Officer, Affiant has also worked in an

undercover capacity for the purpose of purchasing and/or delivering controlled substances; and has participated in the preparation of affidavits in support of numerous search and arrest warrants for violations of federal drug laws contained in Title 21, United States Code, as well as in the execution of the same. In addition, Affiant has on numerous occasions, as a Task Force Officer with the DEA, made seizures of contraband, conveyances, currency, drug paraphernalia, and firearms possessed or used in relation to violations of Title 21, United States Code, Section 841. Affiant has successfully conducted numerous investigations that have resulted in the arrest of numerous drug traffickers and the seizure of significant quantities of drugs and drug-related proceeds. Affiant has further conducted surveillance operations of drug traffickers and has interviewed numerous persons personally involved in drug trafficking. Affiant has also supervised numerous confidential sources during controlled purchases of narcotics. Through this training and experience, Affiant has become familiar with, and has gained a thorough understanding of the methods, manner and means used by individuals engaged in the unlawful manufacturing, trafficking, and use of controlled substances.

3. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other agents and law enforcement officers; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the investigation. Unless otherwise noted, wherever in this Affidavit I assert that a statement was made, the information was provided by my personal observation, by another special agent, law enforcement officer or witness who had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have

read and reviewed. Affiant has not included each and every fact known to her concerning this investigation. Rather, Affiant has set forth only the facts Affiant believes are necessary to establish probable cause.

### **PROBABLE CAUSE**

#### **Investigation Prior to April 7, 2020**

4. On February 12, 2020 Detectives from the Cleveland Police Department (CPD) First District Vice Unit received a complaint regarding drug activity in the area of West 145<sup>th</sup> Street and Rainbow Drive in Cleveland, Ohio. The complaint described the drug dealer as a light skinned black male with short braids. One of the vehicles the dealer was known to drive was a dark gray Volvo, with Ohio temporary tag K587177. The complaint stated that the above-described male would meet unidentified persons waiting in their cars and engage in hand to hand drug transactions at all times of the day. CPD Detective McNamara conducted surveillance on several occasions but was unable to observe the activity the residents described.

5. On March 18, 2020, CPD detectives began receiving numerous drug complaints for the area of West 132<sup>nd</sup> Street and Lorain Ave from the residents on West 132<sup>nd</sup> Street. The concerned citizens provided Detectives with information on the drug dealer's vehicles, which were described as a dark gray Volvo bearing Ohio temporary tag #K587177 and a Chevy Malibu bearing Ohio license plate GMM 2660, which were being driven by a light skinned black male with braids. This suspect would meet multiple unidentified persons on West 132nd Street and engage in hand to hand transaction with the buyers. Detective McNamara subsequently realized that this was the same suspected dealer from the previous complaint, and utilizing law enforcement databases, was able to

identify YOUNGER as the suspected drug dealer. Detectives checked YOUNGER's criminal history and learned that he had prior arrests for drug trafficking and weapons offenses.

6. On March 24, 2020 CPD detectives were conducting surveillance in the area of West 145<sup>th</sup> Street and Rainbow Avenue, and observed the aforementioned gray Volvo parked at the Sunoco Gas station located at the corner of Triskett and Warren Avenue. Detectives attempted to initiate an investigative stop but the driver fled at a high rate of speed north on Warren Road. Detectives did not engage in pursuit.

7. On March 28, 2020, CPD Detectives once again established surveillance in the same area and spotted the gray Volvo parked in the George's Kitchen parking lot at 13101 Triskett Avenue. Detectives attempted to initiate an investigative stop but the driver fled at a high rate of speed westbound on Triskett. Detectives did not engage in pursuit. Detective McNamara was able to positively identify YOUNGER as the driver of the Volvo.

8. Following these encounters with YOUNGER, CPD Detectives conducted surveillance at YOUNGER's listed address in, Berea, Ohio. Detectives observed the gray Volvo parked in the driveway.

9. On April 5, 2020, CPD Sergeant McGrath was in the area of West 131<sup>st</sup> Street and Bellaire Avenue when he spotted a Chevy Malibu bearing Ohio license plate GMM 2660 parked in a driveway on West 131<sup>st</sup> Street. Sergeant McGrath had prior knowledge that YOUNGER was known to sell drugs in this vehicle, and he was also aware YOUNGER fled from the police on prior occasions. With the assistance of other marked units, Sergeant McGrath decided to approach the vehicle. When officer activated their

emergency lights, they observed a light skinned black male, with short braids and wearing blue latex gloves<sup>1</sup>, put the vehicle in reverse and then flee at a high rate of speed, driving over several tree lawns. Officers did not engage in pursuit.

**Arrest of YOUNGER on April 7, 2020**

10. On April 7, 2020 CPD Detectives were conducting surveillance in the area of West 132<sup>nd</sup> Street and Lorain Avenue when they observed YOUNGER's gray Volvo. Detectives followed the suspect vehicle to the area of 11116 Detroit Avenue, where they observed the driver back into a parking spot and park. Detectives observed an unknown male walk up to the Volvo's passenger's side window and engage the driver in conversation. Believing that a drug transaction was about to take place, detectives decided to approach the suspect vehicle and initiate an investigatory stop. Detectives entered the parking lot from the east and activated their lights and sirens. The driver of the Volvo then pulled away westbound through the lot but was forced to turn around when he found himself corralled in a dead end. The suspect drove at a high rate of speed eastbound towards the detective cars, intentionally striking multiple vehicles occupied by CPD Detectives. The Volvo then struck several parked cars in the lot while attempting to flee from the police. At West 112th Street, the VOLVO collided with a parked Chevy Equinox, which disabled the suspect's vehicle. The suspect then exited the passenger side of the Volvo and ran across Detroit Avenue to West 112th Street as detectives pursued on foot. The driver of the Volvo, who would later be identified as JEFFREY POULTNEY-YOUNGER JR, climbed up to the rooftop of 11225 Detroit Avenue, and

---

<sup>1</sup> Based on my training and experience, drug dealers sometimes wear latex gloves to protect themselves from exposure to highly potent drugs like fentanyl.

when he found himself surrounded with no place to run, YOUNGER surrendered and came down from the roof. Detectives were able to place YOUNGER under arrest without further incident.

11. Detectives conducted an inventory search of the gray Volvo incident to YOUNGER's arrest, and inside the vehicle detectives seized a loaded 9mm Smith & Wesson handgun, which was found on the driver's side floor board. Detectives also seized a plastic bag containing U.S. Currency from the passenger side floor board, and there was also currency in the center console and more currency in a garbage bag in the trunk. From the glove box, detectives seized three plastic bags containing what they believed to be heroin, a heroin press and cutting agent. A scale with residue was found in the back seat along with four cell phones that were found throughout the vehicle. A plastic bag with cocaine was seized from the driver's door panel.

12. The suspected heroin and cocaine were subsequently analyzed at the Cuyahoga County Regional Forensic Sciences (CCRFSL) and testing confirmed that the suspected heroin was actually approximately 209 grams of Fentanyl, and the cocaine was approximately 1.51 grams of cocaine base. The currency seized from YOUNGER's vehicle was found to be \$24,143.00 dollars.

13. The 9mm Smith & Wesson handgun recovered from the driver's side floorboard of the Volvo was likely manufactured outside the State of Ohio, since no Smith & Wesson firearms are manufactured within the State of Ohio.

14. YOUNGER is prohibited from possessing a firearm under federal law, and knew of his status as a convicted felon, due to a prior conviction for Burglary (F3), in case

number CR-16-609575, on or about February 6, 2017, in the Cuyahoga County Common Pleas Court.

15. Additionally, based on my training and experience, and the facts set forth in this affidavit, the loaded 9mm Smith & Wesson handgun was possessed by YOUNGER in furtherance of a drug trafficking crime, to wit: possession of fentanyl with intent to distribute. In reaching that conclusion, Affiant submits that 209 grams of fentanyl is an amount indicative of distribution, and is far beyond what a drug user might possess for personal use. Affiant knows that drug traffickers commonly carry firearms to protect themselves during drug deals, and will often store their firearm in a readily-accessible area. Affiant also knows that the presence of a large amount of cash (such as the \$24,143 in cash seized from the Volvo) is indicative of drug trafficking. Additionally, the presence of a heroin press and a digital scale in the Volvo are indicative of drug trafficking.

**Investigation Since April 7, 2020**

16. On April 8, 2020 the City Of Cleveland Prosecutors Office reviewed the case against YOUNGER and issued charges for Felonious Assault on a Police Officer and Drug Trafficking. Shortly after being charged, YOUNGER posted bond and was released.

17. During the week of April 14, 2020, through CPD Detectives and a citizen complainant, Affiant learned that YOUNGER was out on bond and once again conducting drug transactions at West 132<sup>nd</sup> Street and Lorain Avenue.

18. On April 15, 2020, Affiant was contacted by the complainant, who informed Affiant the one of YOUNGER's suspected drug customers was waiting on West 132<sup>nd</sup>

Street. Affiant established surveillance and observed the white female occupant conducted a suspected drug transaction with the driver of a gray Ford Edge, driven by a light skin black male with braids, upon its arrival in the area. Affiant confirmed the vehicle's registration and learned that it was a rental car. Affiant continued surveillance on the vehicle and observed the driver conduct another suspected drug transaction in the parking lot of the Home Depot on West 117<sup>th</sup> Street in Cleveland. After the suspected drug transaction, TFO Matos confirmed that YOUNGER was the driver of the gray Ford Edge. Affiant and CPD detectives then observed as YOUNGER completed another suspected drug transaction in the same parking lot. Investigators attempted to maintain surveillance on YOUNGER after that transaction, but lost the vehicle on West 117<sup>th</sup> Street.

19. During the same week of April 14, 2020 (while YOUNGER was on bond for state charges), investigators observed YOUNGER in a white Kia Soul making multiple suspected drug transactions in Cleveland. Investigators decided to stop one of the suspected customers, and upon contacting that person, they admitted to buying heroin from YOUNGER and positively identified a photo of YOUNGER. That individual decided to cooperate with law enforcement and will hereafter be referred to as the Confidential Source (CS). Affiant submitted the suspected heroin to the CCRFSL, and lab results are pending.

20. During the week of April 20, 2020 (while YOUNGER was still on bond for state charges), Affiant and DEA Agents again met with the CS for the purpose of making a controlled purchase of heroin from YOUNGER. The CS made a recorded call to YOUNGER, which was monitored by investigators. During the call, the CS and

YOUNGER agreed to meet at a location in Cleveland, Ohio. SA Moses then equipped the CS with an audio/transmitting device, and Affiant provided the CS with pre-recorded buy money.

21. Investigators conducted surveillance as the CS and YOUNGER met, and the CS purchased drugs from YOUNGER. After the transaction, the CS met back with investigators and handed Affiant a paper containing gray colored rock like material, believed to be heroin that the CS purchased from YOUNGER with the CPD buy money.

22. Investigators continued following YOUNGER for a time, and witnessed him conduct several additional suspected drug transactions. Surveillance on YOUNGER was ultimately lost.

23. Affiant later submitted the suspected heroin to the DEA North Central Laboratory for analysis, which is still pending as of the writing of this affidavit.

24. Based on this investigation, YOUNGER's drug trafficking activity is ongoing in nature.

### **CONCLUSION**

Based on the information set forth above, Affiant submits that there is probable cause to issue the requested complaint against JEFFREY POULTNEY-YOUNGER.

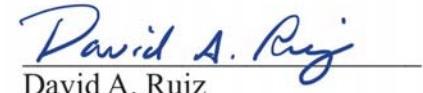


---

Maria Matos  
Task Force Officer  
Drug Enforcement Administration

Sworn to via telephone after  
submission by reliable electronic  
means on this day

Apr 24, 2020 . F.R.C.P. 4.1; 41(d).



---

David A. Ruiz  
United States Magistrate Judge